

Koch, Kristine

From: Shephard, Burt
Sent: Tuesday, July 15, 2014 10:20 AM
Subject: RE: Draft FS Revision Process; Updated Matrix Table and Action Items List for 11-July-14

Kristine,

A couple of responses to address issues listed on the 7/11/2014 draft FS action items list.

Meeting Action Item #3. LWG's statement that aldrin is not an ecological COC is wrong. Aldrin is identified as an ecological COC for the invertivorous bird assessment endpoint, dietary ingestion line of evidence for spotted sandpiper. Aldrin is identified as a COC in BERA Chapter 8, risks to the sandpiper are summarized in BERA Tables ES-5, 8-15, 8-17, 8-48, 8-49, 8-50, 11-1, 11-2 and 11-3. Page 781 of the BERA (Chapter 11, the summary chapter) explicitly states that all contaminants posing potentially unacceptable risk (defined as synonymous with COC in the BERA glossary) at the end of the BERA were recommended to be carried forward to the FS. The decision regarding what to do with aldrin in the FS is a risk management decision for you.

Revised FS Preliminary Remediation Goals (PRG) Issue 2.3, Item 7 (avian PRGs for DDx and PeCDF). The PeCDF PRGs are hung up as part of the larger issue regarding calculation of sediment PRGs for dioxins/furans. Dioxin/furan TEQ is an ecological COC based on an HQ ≥ 1.0 in both the invertivorous and piscivorous bird assessment endpoint, dietary ingestion line of evidence, and also a COC in the piscivorous bird contaminants in bird egg tissue line of evidence. As such, it's a COC forwarded into the FS from the BERA via multiple assessment endpoints and lines of evidence.

DDx and DDE risks to the piscivorous and invertivorous bird assessment endpoints poses an interesting question I've never run into before. Both total DDx and DDE pose risks to spotted sandpiper via the dietary ingestion pathway, therefore, both total DDx and DDE are COCs forwarded to the FS. The sandpiper line of evidence can serve as a basis for both total DDx and DDE sediment PRGs, I don't believe LWG is questioning that.

The issue is with the piscivorous bird assessment endpoint and DDE. DDE is a COC in the belted kingfisher dietary ingestion line of evidence. Kingfishers are one of the three target ecological receptors, along with osprey and bald eagle, in the piscivorous bird assessment endpoint. Neither total DDx or DDE is a COC for bald eagle or osprey in either the dietary or bird egg lines of evidence. DDE was a COC to bald eagle in earlier drafts of the BERA via the bird egg line of evidence, but the delisting of eagles from the threatened species list changed the way eagle risks were calculated in the final BERA, resulting in DDE in bird eggs screening out of the final BERA. The issue I haven't seen before is what to do when a contaminant screens in for an assessment endpoint (i.e. DDE in kingfisher diet), but screens out of the line of evidence that results in the most protective sediment PRG. Neither Bruce Duncan nor Joe Goulet had seen this before either. Best we could come up with was to treat the already calculated DDE in sediment PRG from the piscivorous bird egg line of evidence as analogous to a TBC during ARAR identification in an RI/FS. This is because a goal of the BERA is to protect the assessment endpoint, not just individual lines of evidence used to assess risks to the assessment endpoint.

The spotted sandpiper sediment PRG for DDE, based on dietary ingestion, calculates out to be 7.1 $\mu\text{g}/\text{kg}$ DDE in dry weight sediment, compared to the 2.8 $\mu\text{g}/\text{kg}$ DDE in sediment PRG calculated from the osprey egg line of evidence. This should be in the spreadsheet you already have, and the spreadsheet Jennifer Peterson and I looked at last week (although we didn't look at the sandpiper calculation specifically).

Best regards,

Burt Shephard
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"Facts are stubborn things"
- John Adams

From: Koch, Kristine

Sent: Monday, July 14, 2014 8:50 AM

To: Alex Liverman (liverman.alex@deq.state.or.us); Allen, Elizabeth; Audie Huber (audiehuber@ctuir.com); Bob Dexter; Brian Cunningham (cunningham@gorge.net); callie@ridolfi.com; Coffey, Scott; Conley, Alanna; Erin Madden (erin.madden@gmail.com); Fuentes, Rene; Gail Fricano (gfricano@indecon.com); Genevieve Angle (Genevieve.Angle@noaa.gov); Hagerman, Paul; Holly Partridge (Holly.Partridge@grandronde.org); JD Williams (jd@williamsjohnsonlaw.com); peterson.Jennifer@deq.state.or.us; Jeremy_Buck@fws.gov; Julie Weis (jweis@hk-law.com); Matt Johnson (matt@williamsjohnsonlaw.com); Matt McClincy (mcclincy.matt@deq.state.or.us); Michael.karnosh@grandronde.org; poulsen.mike@deq.state.or.us; Muza, Richard; rdelvecchio@indecon.com DelVecchio; Robert.Neely@noaa.gov; Rose Longoria (rose@yakama.com); Ryan Sudbury (Ryan.Sudbury@grandronde.org); Sheldrake, Sean; Shephard, Burt; Todd King (KingTW@cdmsmith.com); tomd@ctsi.nsn.us; Tom Gainer (gainer.tom@deq.state.or.us)

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All – Here is the latest update from the LWG.

Kristine Koch
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From: Jennifer Woronets [<mailto:jworonets@anchoragea.com>]

Sent: Friday, July 11, 2014 4:10 PM

To: Koch, Kristine

Cc: Amanda Shellenberger; Bob Wyatt; Carl Stivers; Jennifer Woronets; Jim McKenna (jim.mckenna@verdantllc.com); King, Todd W.; Mullin, Jeanette; Patty Dost; Scott Coffey (coffeyse@cdmsmith.com); Sheldrake, Sean

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Kristine,

Please see below and attached from Carl.

Let us know if you have any questions.

Thank you,
Jen Woronets ☺
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From: Carl Stivers
Sent: Friday, July 11, 2014 3:05 PM
To: James McKenna
Cc: Bob Wyatt; Jennifer Woronets; Amanda Shellenberger; Patty Dost
Subject: RE: Draft FS Revision Process; Updated Matrix Table and Action Items List for 11-July-14

Kristine -

Please find attached an updated FS Revision Process Matrix. Changes since last week's matrix are shown in red. This week's changes reflect updates in information transferred between LWG and EPA. Please let us know if we have accurately captured the schedule and list of subjects for the upcoming technical meetings.

Also attached is a summary list of action items compiled from the last twelve technical meetings (COCs, PRGs, RALs, SDUs, Technology Screening Matrix, PTW, SMAs, Buried Contamination, Disposal Sites, CDF Treatment, Dredge Depths, Source Material). This update includes completion of some action items from recent meetings.

Let us know if you have any questions about any of this.

Thanks much.

Carl

Carl Stivers

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